

1 some point -- I understand you are not -- we are going
2 to look at some documents. It's not going to be a
3 trick. I just -- I want to get your recollection of the
4 sequence.

5 But at some point you instructed procurement to
6 acquire a GateGuard device, and then after that, you
7 recall a conversation where ClearPro contacted you about
8 that procurement order. Is that right?

9 A That is correct.

10 Q So going to the time when -- when you made that
11 order to procurement to -- to procure the GateGuard
12 device, why did you -- why did you seek to procure a
13 GateGuard device?

14 MR. BELELIEU: Objection to the extent it calls
15 for privileged information.

16 You can answer otherwise.

17 THE WITNESS: Does that mean I can answer?

18 Q MR. QUANTON: I think that means -- when --
19 when I am saying -- basically, my question is why did
20 you seek to procure a GateGuard device, or why did you
21 seek to order somebody to procure the GateGuard device?

22 And your counsel is saying, well, if,
23 basically, lawyers told you to do it, don't get into
24 that. So I'm not interested in what lawyers may have
25 told you.